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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11 Plaintiff,

12 v.

13 RICHARD JOSEPH CHASE,  
14 Defendant.  
15

Case Nos. 2:18-cr-00250-JCM-NJK  
2:16-cr-171-GMN-CWH  
2:10-cr-00568-GMN-PAL

**STIPULATION TO CONTINUE  
REVOCATION HEARING AND  
CONSOLIDATE CASES**

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17 It is stipulated and agreed to by and between Federal Public Defender Rene L.  
18 Valladares and Assistant Federal Public Defender Sylvia Irvin, counsel for Richard Joseph  
19 Chase, and United States Attorney Dayle Elieson and Assistant United States Attorney Daniel  
20 Cowhig, that the above-referenced cases should be consolidated for the setting of the Final  
21 Revocation Hearings at the same date and time as the Sentencing Hearing currently scheduled  
22 before District Judge James C. Mahan on January 11, 2019, at 10:00 a.m.. *See* Case No. 2:18-  
23 cr-00250-JCM-NJK, ECF No. 8.  
24  
25  
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1           This stipulation is entered into for the following reasons:

2           1.       Petitions for Warrant for Offender Under Supervision were filed on May 31,  
3           2018, in Case No. 2:16-cr-171-GMN-CWH (ECF No. 30), and on June 22, 2018, in Case No.  
4           2:10-cr-568-GMN-PAL (ECF No. 74).

5           2.       The Petition in Case No. 2:16-cr-171 (ECF No. 30) alleges three allegations  
6           against Mr. Chase, and the Petition in Case No. 2:10-cr-568 (ECF No. 74) alleges two  
7           allegations that are the same as the first two allegations in Case No. 2:16-cr-171. Final  
8           Revocation Hearings on the Petitions currently are scheduled for October 9, 2018, at 10:30 a.m.  
9           before District Judge Gloria M. Navarro. *See* Case No. 2:16-cr-171 (ECF No. 49); Case No.  
10          2:10-cr-568-GMN-PAL (ECF No. 92).

11          3.       On October 2, 2018, in Case No. 2:18-cr-00250-JCM-NJK, Mr. Chase waived  
12          indictment and entered a plea of guilty pursuant to a plea agreement to one count of felon in  
13          possession of a firearm. *See* Case No 2:18-cr-00250 (ECF Nos. 4-8). District Judge Mahan  
14          conditionally accepted Mr. Chase's guilty plea and scheduled the sentencing hearing for  
15          January 11, 2019. ECF No. 8.

16          4.       At the end of the hearing, the parties advised that they would like to consolidate  
17          the sentencing hearing and revocation hearings. *Id.* The consolidation of the three cases will  
18          allow the parties to serve both the interests of justice and judicial economy. Consolidation will  
19          also allow the Court to impose sentence in all three matters on the same date, avoiding  
20          unanticipated or unintended complications in the later sentence computations by the United  
21          States Bureau of Prisons.

5. The parties respectfully request that the three cases be consolidated and there be one hearing on January 11, 2019, at 10:00 a.m., before District Judge Mahan.

DATED this 4th day of October, 2018.

RENE L. VALLADARES  
Federal Public Defender

DAYLE ELIESON  
United States Attorney

By /s/ Sylvia A. Irvin  
 SYLVIA A. IRVIN  
 Assistant Federal Public Defender  
 Attorney for Richard Joseph Chase

By /s/ Daniel Cowhig  
DANIEL COWHIG  
Assistant United States Attorney

## ORDER

Based upon the foregoing stipulation and good cause appearing,

IT IS THEREFORE ORDERED, that in the interests of justice and judicial economy, Case Nos. 2:18-cr-00250-JCM-NJK, 2:16-cr-171-GMN-CWH, and 2:10-cr-00568-GMN-PAL, be consolidated and heard before the Honorable James C. Mahan, on January 11, 2019, at 10:00 a.m.

Dated October 11, 2018.

UNITED STATES DISTRICT JUDGE